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6	Expedia, Inc.	DISTRICT COURT
7	UNITED STATES DISTRICT COURT  DISTRICT OF NEVADA	
8		
9	TALITHA SMITH,	)
10	Plaintiff,	) )
11	vs.	STIPULATION AND REQUEST FOR EXTENSION OF TIME FOR
	EXPEDIA, INC. d/b/a CLASSIC VACATIONS, LLC; DOES I-X, inclusive; and	DEFENDANT EXPEDIA, INC. TO RESPOND TO PLAINTIFF'S
12	ROE CORPORATIONS I-X, inclusive.	COMPLAINT
13	Defendants.	(Second Request)
14	The Parties, by and through their respective counsel of record, stipulate and request that this	
15	Court further extend the time for Defendant Expedia, Inc. d/b/a Classic Vacations, LLC (hereinafter	
16	referred to as "Expedia"), to respond to Plaintiff's Complaint, up to and including Friday, April 2.	
17	2021. In support of this Stipulation and Request, the parties state as follows:	
18	1. Plaintiff served Defendant Expedia with a copy of the Summons and Complaint on	
19	February 4, 2021. The original deadline for Expedia to respond to Plaintiff's Complaint was Thursday,	
20	February 25, 2021.	
		ubmitted a Stipulation and Order to extend the time
21	for Expedia to respond to Plaintiff's Complaint until March 12, 2021 (First Request) while the parties	
22	continued early settlement discussions. (ECF No. 7) The court approved that extension on February 19, 2021. (ECF No. 8)	
23		
24	.,	

- 3. Counsel for both parties are continuing their discussions regarding a potential early resolution of this matter. While those discussions continue, counsel for both parties believe it would be prudent to conserve their respective resources and focus on determining whether this matter may be resolved. Counsel for both parties have discussed and agreed to a second extension of time for Expedia to respond to Plaintiff's Complaint.
- 4. This is the second request for an extension of time for Defendant Expedia to respond to Plaintiff's Complaint, and is not sought for any improper purpose or other reason of delay. This extension is sought only to secure sufficient time to assess whether the parties' present discussions as to a potential early resolution of this matter may be achieved.

WHEREFORE, the parties respectfully request that Defendant Expedia be permitted a further extension of time, up to and including **April 2, 2021**, to respond to Plaintiff's Complaint.

By:

DATED this 8th day of March 2021.

HOLMAN LAW OFFICE

KAMER ZUCKER ABBOTT

By: /s/ Kristina S. Holman

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Attorney for Plaintiff

Attorneys for Defendant Expedia

## **ORDER**

IT IS SO ORDERED.

DATED: March 9, 2021

UNITED STATES MAGISTRATE JUDGE